INSPECTION REPORT

for

RCRA Subtitle C

at

Brenntag Northeast Inc.

81 West Huller Lane

Reading, PA 19605

PAD002361764

Large-Quantity Generator

Inspection Date

July 29-30, 2014

Garth Connor
Inspection Team Leader
Office of Enforcement, Compliance & EJ
December 17, 2014

Brenntag Northeast, Inc.
Reading, PA 19605
July 29, 2014

PAD002361764

Inspectors:

Garth Connor – Inspection Team Leader, USEPA – Philadelphia, PA
Robert Staves – Water Inspector, USEPA – Philadelphia, PA
James Kline – RCRA Inspector, USEPA – Wheeling, WV
Justin Young - RCRA Inspector, USEPA – Fort Meade, MD
Kalen Boyer – RCRA Inspector, PADEP's Reading Office
Eric Ammon – Water Inspector, PADEP's Reading Office

Facility Representatives:

Sarah Stapleton, Quality Manager, 610-461-7700
Jack Thorne, Director of Quality Assurance
Dennis Eisenhofer, Vice-President of Operations

Background

Brenntag Northeast, Inc. (Brenntag) is a major distributor of industrial chemicals, and is currently the global market leader in that industrial sector. Large quantities of chemicals are brought to the facility by truck or by railroad car, and are then stored both inside and outside of the facility. Some of these chemicals are re-packaged prior to their distribution to Brenntag's customers. This facility was selected for inspection by EPA staff during fiscal year 2014. The Pennsylvania Department of Environment's (PADEP) Reading Office was notified several weeks in advance of the inspection. Kalen Boyer and Eric Ammon work in that office and both attended the entire inspection of the facility along with the EPA inspectors. All facts in this report are based on the inspector's observation, comments by the facility representatives, or documents reviewed before, during, or after the on-site inspection. The inspectors entered the facility shortly after 1:30 PM on Tuesday, July 29, 2014, and the inspection then continued on Wednesday, July 30, 2014. The inspectors were met by Sarah Stapleton, the facility's Quality Manager, at the visitor's entrance to the facility. The EPA inspectors began the inspection by showing their credentials to Ms. Stapleton, and then they began a walking tour of the entire operation with facility staff.

Facility History and Operation

Brenntag Northeast has operated at this facility in Ontelaunee Township, Berks County, Pennsylvania since it was first built on farmland in the early 1970's. It is actually located a few miles north of the Reading city limit, but Brenntag does utilize a Reading mailing address. The

company that later became Brenntag first started as an egg wholesaler in Germany in 1874, and it began operations in the chemical distribution business in 1912. Brenntag gradually expanded into new countries all over the world as it acquired other chemical distribution businesses. It currently has facilities on almost every continent with world headquarters in Germany. This Brenntag facility is approximately 40 acres, of which about 18 acres are buildings, such as the warehouses and offices. The facility, which was then known as Textile Chemical Company (Textile), first notified as a large-quantity generator of hazardous waste in September, 1980, and received the EPA ID number PAD002361764. The facility changed its name to Brenntag Northeast, Inc. in May, 2001 after the Textile acquisition, but still utilizes the same EPA ID number originally assigned to Textile. The facility currently operates 3 shifts a day for 5 days per week and has about 105 employees at this location.

The facility has a loading area in the front of their warehouse buildings. The loading area is a large open space with docking stations where a number of trucks can park and then either load or unload their cargo. Facility staff explained to the inspection team that about a million pounds of product are dropped off on a typical work day, so it's quite busy in the loading area. There's a constant stream of trucks coming and going from the loading area. Behind the loading area are a number of warehouses where products are stored until needed in order to fill a customer's request. In the rear portion of the facility, behind the back doors of the warehouses, is an open outside area where additional products are stored in containers on the ground. All three of these segments of the facility were visited by the inspection team on the walking tour of the facility.

Inspection Observations

The inspection of the facility began in the Brenntag laboratory where a variety of chemical testing by lab personnel occurs on a daily basis. The inspectors observed several containers of waste in this area that were not labeled as hazardous waste **(Photograph #1).** These bottles were waste chemicals from the nearby liquid chromatograph machines. One bottle was described by facility staff as KB waste, which is an abbreviation for a Kauri butanol waste solution. Another waste bottle was described as KF waste solution. There wasn't any larger 55-gallon drums nearby for collection and storage of these wastes in the laboratory. Facility staff told the inspectors that these liquid wastes were taken to another part of the facility for disposal.

The tour then continued to the facility's loading area. Off to the side of the loading area was a clean-up area that was called the trash zone, or the sweep collection area, by facility staff. Waste was generated in this area as trucks were cleaned out or containers of product were broken in the loading/unloading process. There were three drums without hazardous waste labels and lacking secure lids in this area, one drum was marked as "Metal Compounds" **(Photograph #2).** Facility staff opened this drum, and a solid waste was visible inside it **(Photograph #3).** Another one of the drums was marked as "granular solids, sodium hydroxide and potassium hydroxide" **(Photograph #4),** and that drum also was shown to contain a solid white waste **(Photograph #5).** In that same area, a Shop-Vac vacuum cleaner was being used to vacuum up hazardous waste dust that was accumulating from the loading area **(Photograph #6).** Facility

staff opened this unit up, and the inspectors took a picture of its contents **(Photograph #7).** The Shop-Vac unit was not labeled as containing a hazardous waste, and facility staff were not certain about how the waste inside the Shop-Vac was subsequently managed.

The inspectors walked outside to observe a number of aboveground storage tanks. The inspectors observed a blue bucket market marked acids drip bucket **(Photograph #8)** near a large storage tank of acid. The inspectors observed that this blue container had no lid and was not being properly managed as hazardous waste. Inspectors took a photograph of its contents **(Photograph #9)**. Nearby were two other drums, essentially drip barrels from a nearby hydrogen peroxide storage tank, these drums were not labeled as hazardous waste or properly closed **(Photograph #10).** A closer view was also taken of this collection process **(Photograph #11),** and a close-up of one of the two drums **(Photograph #12)**. As the inspectors walked around the outside area, near the loading rack, a full steel tote was observed. On this tote, the accumulation start date was not legible, it appeared to have been washed off by some of the solvent that it contained **(See Photograph #13).**

Inspectors walked towards the rear of the property and observed several spills of different products on to the ground. First, a long stain, about 50 feet in length, of a white substance led directly to one of the storm drains in that area of the facility **(Photograph #14).** A white substance had spilled on to the ground and then washed towards the storm drain. Second, there was an oily spill on the ground near several piles of black drums. The inspectors examined several of the nearby drums, which contained substances such as mineral oil and isobutyl alcohol. These drums may have been the source of this spill **(See Photograph #15 & #16)**. In a low area in the rear of the facility, an oily sheen could be seen near a sump area **(Photograph #17).** A second photograph shows the nearby pump utilized to drain this sump area **(Photograph #18)**. Finally, a pinkish purplish liquid was leaking on to the ground from a tote of product. Facility staff described the pink liquid as a potassium permanganate solution **(Photograph #19 & 20).**

The inspectors also observed a tote that were placed right on top of a storm drain **(Photograph #21 & #22).** The placement of the totes in this manner adjacent to and also directly over a storm drain clearly shows bad management practices. In addition, since this container has a capacity well over 55 gallons, it is a 90-day container and facility staff should be inspecting it weekly. There were no records produced by facility staff that indicated that this area was ever inspected as part of the weekly inspections. Brenntag staff explained that the storm drains in this part of the facility flow directly into nearby Willow Creek. Willow Creek is a tributary of the nearby Schuylkill River **(See Attachment #2, Aerial Map of Brenntag)**. In the facility's maintenance area, there were universal waste bulbs that were not dated and were not stored properly **(Photograph #23)**. The facility staff were not maintaining a data base on the accumulation. Two used bulbs were also loose, and not placed in any container.

Finally, the inspectors observed two aboveground steel 3,000-gallon tanks, which the Facility stated was storage for the facility's waste solvents **(Photographs #24 & 25).** These tanks, according to facility personnel statements, were installed in the early 1990's, and are emptied out approximately every 90 days. The Facility generates waste solvents (toluene,

xylene, etc.) during their normal operations. The waste solvents from the aforementioned operations were stated to be manually dumped into one of the two waste solvent storage tanks. The inspectors took additional photographs of the funnel that is used to fill these tanks **Photographs #26 & 27).** The second photograph was taken after facility staff had removed the top of the funnel. The inspectors asked the facility staff if the waste solvents had a volatile organic carbon (VOCs) level above 500 ppm at the point of generation. The facility staff were not certain if the VOCs levels of the waste solvents were above 500 ppm. The facility did not make an official determination of this waste stream at the time of the inspection. The inspectors asked the Facility if they were subject to RCRA subpart BB/CC requirements. The inspectors requested engineering certifications and manufacturing data on those tanks, but those documents were not available. Facility staff did not know anything about the tanks and their ancillary equipment's compliance with the BB/CC regulations.

Waste Generation

The Facility generates hazardous waste in several different ways. First, some of the chemical products get broken or damaged during their movements around the facility, and become hazardous waste. In the loading area, for example, waste is regularly produced in this manner. Damaged products from the loading/unloading area eventually become a waste. Secondly, waste is produced when products are re-packaged, this re-packaging process involves not only placing products into different types and sizes of containers, but also mixing products with other chemicals to produce a new mixture which is then sold to a customer.

Records Review

Inspector Rob Staves reviewed the facility's weekly inspection logs, and found gaps in the inspection logs, there were multiple weeks where no inspections were performed by facility staff **(Attachment #3 – Weekly Inspection Logs).** In addition, the weekly logs did not seem to properly categorize the existing conditions at the facility. The logs never indicated that there were any leaking containers or spilled liquids on the ground. The inspectors observed several different spills, and there was clear evidence of spilled materials in the rear portion of the facility. Inspectors Justin Young and Jim Kline asked for the design drawings of the waste solvent tanks. The inspectors also asked for engineering certification and manufacturing data of the two waste solvent tanks. Inspectors also requested any leak detection program or tank inspections being conducted at those tanks. At the time of the inspection, facility personnel couldn't find the drawings and did not have any other documentation with regards to the waste solvent tanks. The RCRA inspectors asked about the facility's hazardous waste training. Ms. Stapleton explained that she did the RCRA training, but there was no records of her receiving any RCRA training. In addition, Mark Hoffman of the facility staff did not appear to be have received RCRA training. The RCRA training provided by the facility to its staff was only 15 minutes in length.

The facility spill plan appeared to be inadequate, and it also stated that the facility had not any spills since June, 1987 **(Attachment #4 &#5 – Facility SPCC Plan and Facility PPC Plan).** The plan had no table of contents and no discussion at all of its hazardous waste

management program In addition, the spill plan listed emergency contact personnel that were no longer working at the facility, and needed to be updated.

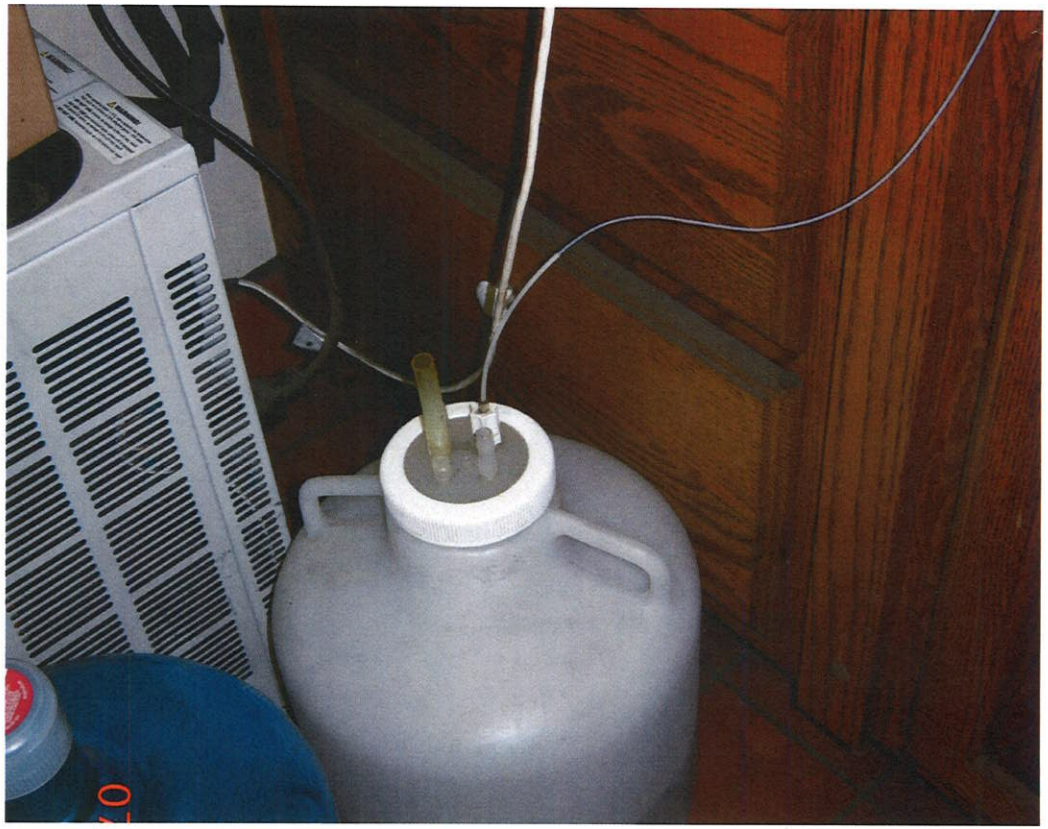
Exit Conference

Before leaving the facility the inspectors discussed the deficiencies found during the inspection. The facility staff present for the exit conference discussed a number of issues with the inspection team, and tried to find appropriate paperwork to meet the inspector's requests. The PADEP Water inspector, Eric Ammon, issued a Notice of Violation (NOV) to the facility for a violation of the PA Clean Streams Act. Mr. Ammon told facility staff that the various chemical spills observed during the inspection were an illegal discharge to a Pennsylvania stream.

Attachment #1 - Inspection Photographs

Photograph #1

These two containers was collecting waste in the lab room from a nearby liquid chromatograph machine. Neither was labeled as hazardous waste.



Photograph #2

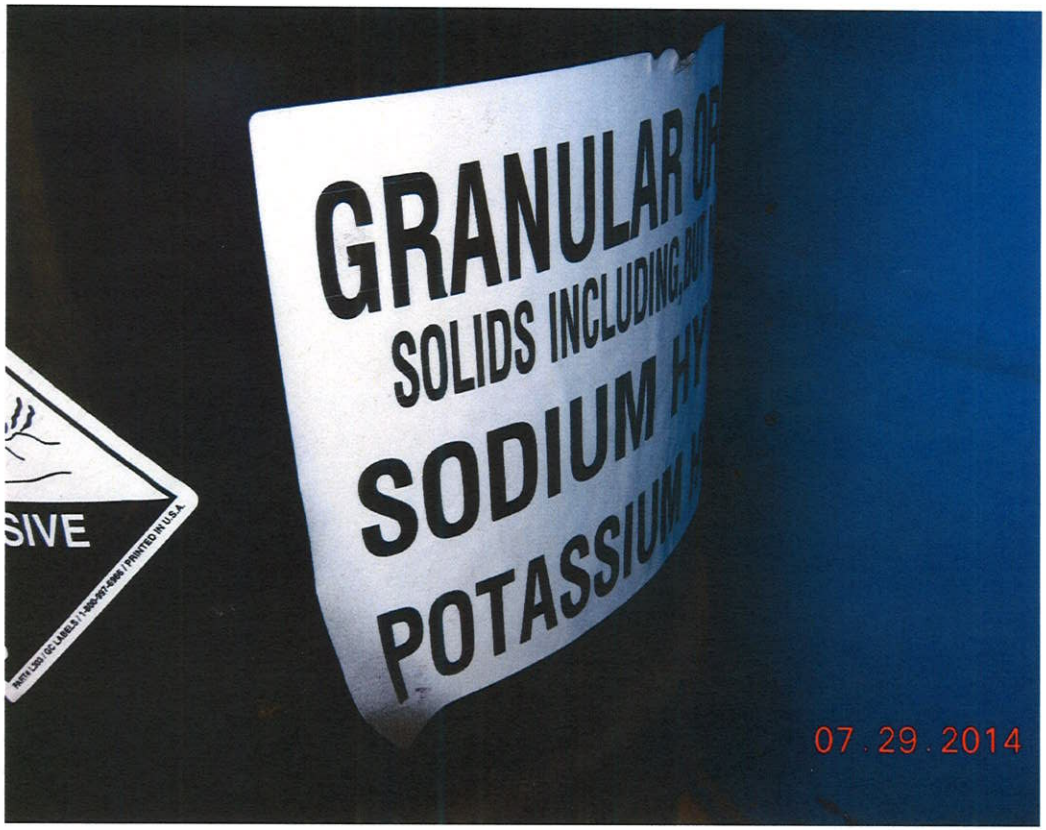
Drums located at side of loading/unloading area marked metal compounds, etc. These drums were not labeled as hazardous waste and the lids were not secured.

Photograph #3

This is the contents of the drum shown in Photograph #2, and described as metal compounds. A white solid dust was in the drum at the time of the inspection.

Photograph #4

Drum marked as granular solids including sodium hydroxide & potassium hydroxide. Although is had a corrosive label on it, it was not labeled as hazardous waste.



Photograph #5

Contents of drum near loading area that was not labeled as hazardous waste.

Photograph #6

The Shop-Vac located as the side of the loading area, and described as the sweep collection zone. The Shop-Vac was not labeled as hazardous waste.

Photograph #7

Facility staff opened the Shop-Vac for the EPA inspectors, and this photograph shows the contents of the machine. It was not labelled as hazardous waste.

Photograph #8

Acids drip bucket from nearby tank.

Photograph #9

Contents of acids drip bucket. This bucket did not have a lid or a hazardous waste label.

Photograph #10

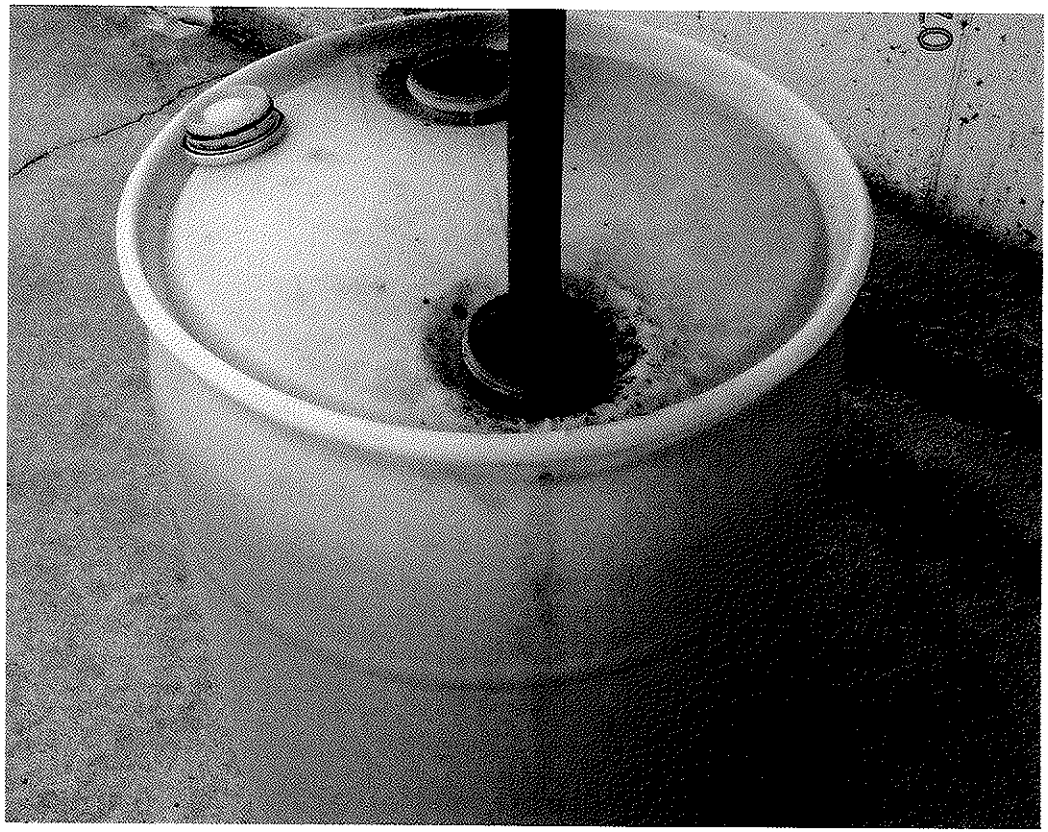
These drums were receiving waste via the reddish hose coming from a nearby tank of hydrogen peroxide. See Photograph 11 for picture of the tank to drum process.

Photograph #11

Gray tank is visible at top, and red hose leads to two drums in Photograph #10.

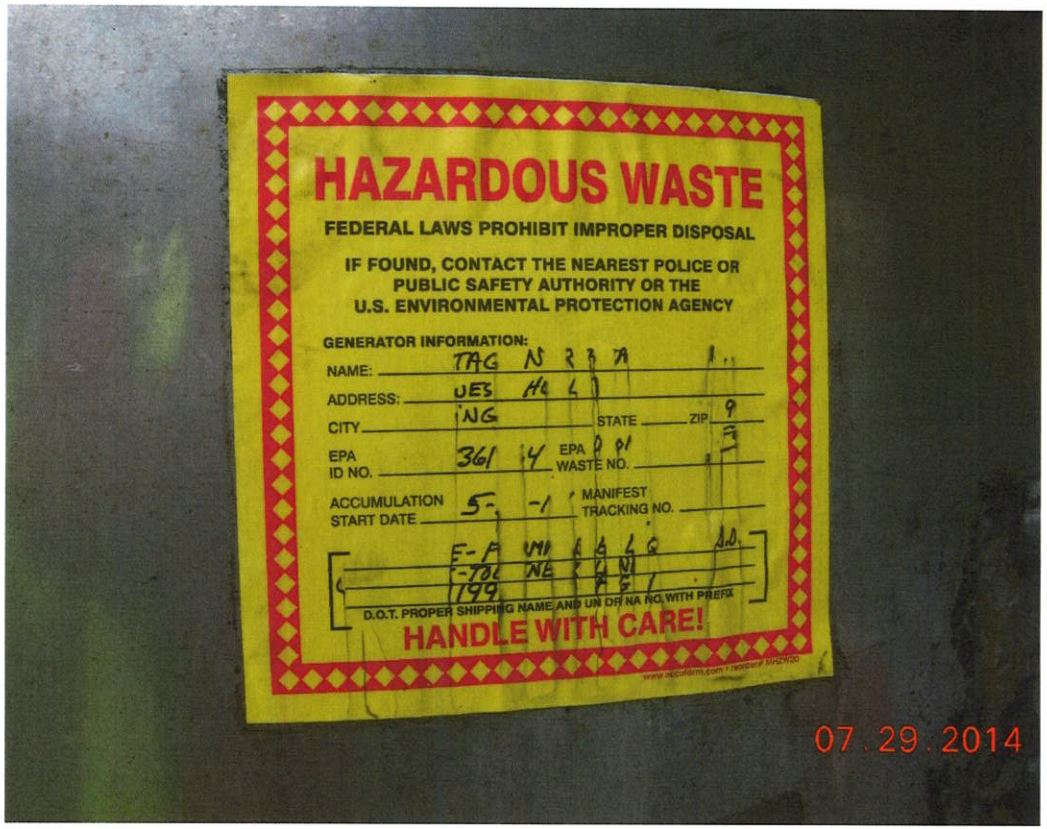
Photograph #12

Close-up photograph of the one drum with hose in it. Notice the drum is almost completely full.



Photograph #13

Photograph of drum with writing on label partly illegible. Inspectors could not properly read the label, and about half of the writing was washed off.



Photograph #14

Spill of a white substance on the ground and flowing directly towards a nearby storm drain.

Photograph #15

Second spill on pavement near large number of black drums.

Photograph #16

Second photograph of spill on pavement nearby large group of black drums.

Photograph #17

Sump area in low segment of rear portion of facility showing noticeable oily sheen on the ground.

Photograph #18

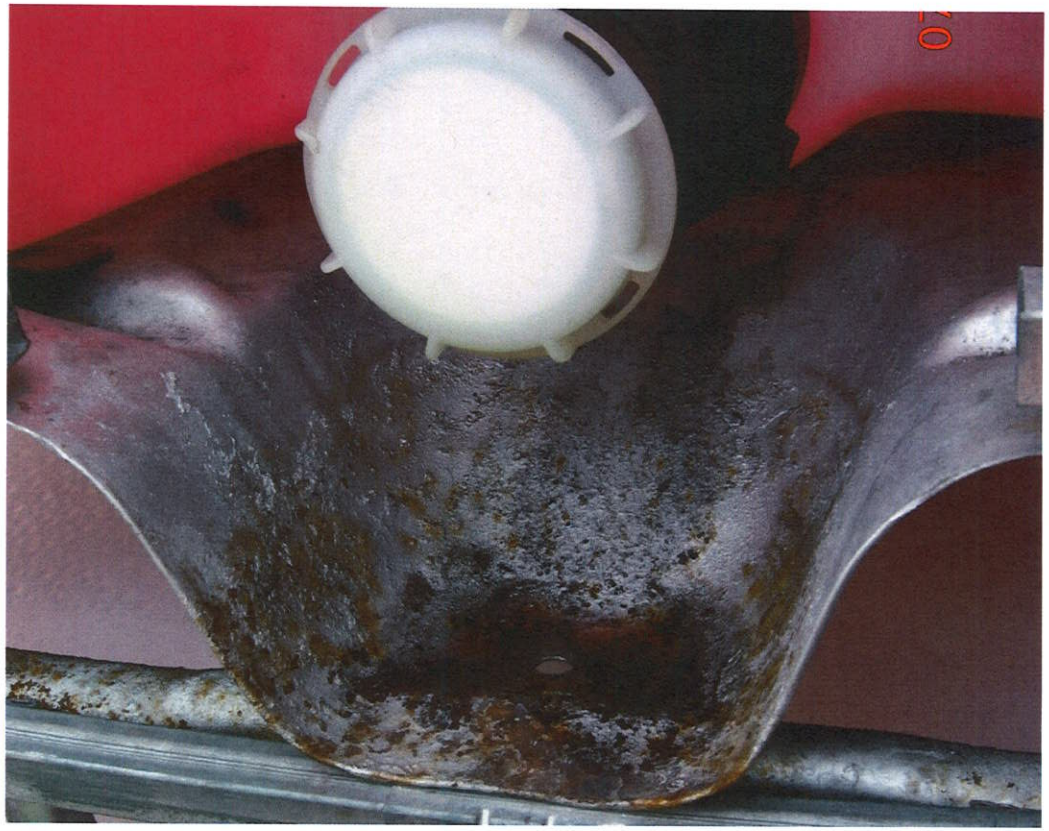
Second photograph of sump area with nearby pump used for draining accumulated liquids.

Photograph #19

A pink liquid in these large totes was described as potassium permanganate by facility staff.

Photograph #20

The solution was leaking from one of the totes and dripping on to the ground nearby.

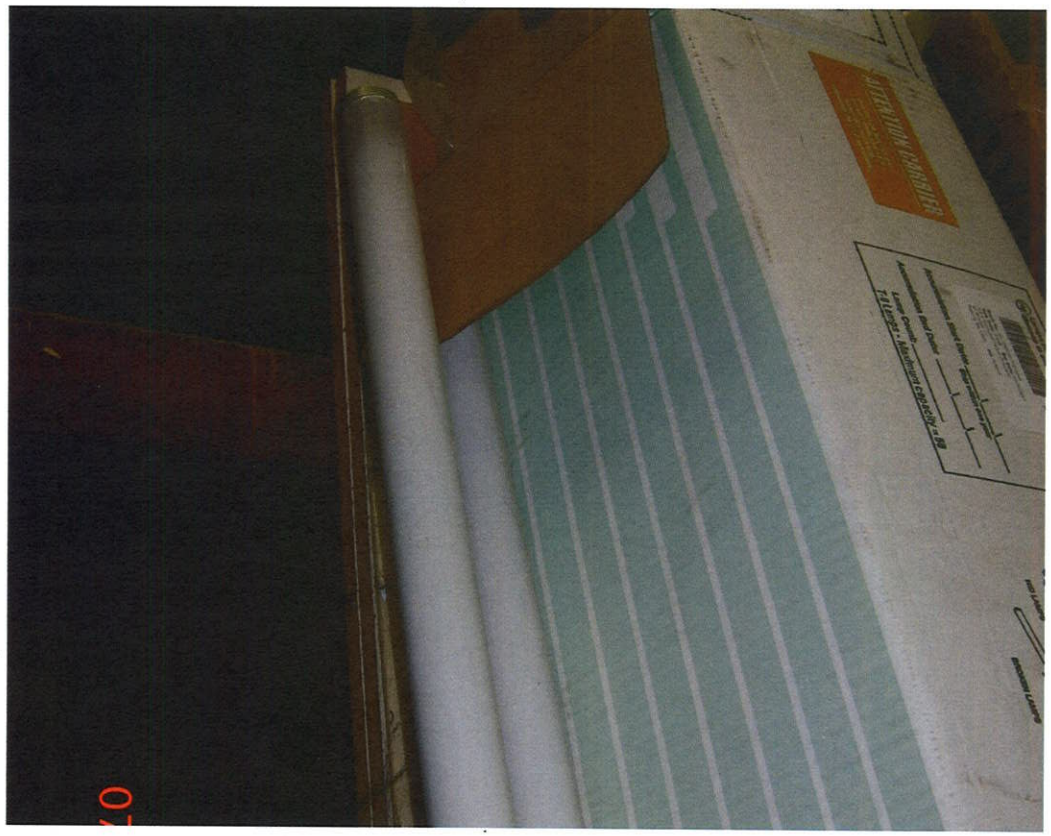


Photograph #21 – Three totes placed near storm drain

Photograph #22 – Hazardous Waste tote place on top of storm drain, two other totes are adjacent to it.

Photograph #23

In the facility's maintenance area, universal waste bulbs were not stored properly and were not dated. Two loosed bulbs are outside of box.



Photograph #24

Photograph of aboveground waste solvent tank #1. This is a steel tank with a capacity of 3,000 gallons.

Photograph #25

This is a photograph of the waste solvent tank #2. It is also has a capacity of 3,000 gallons.

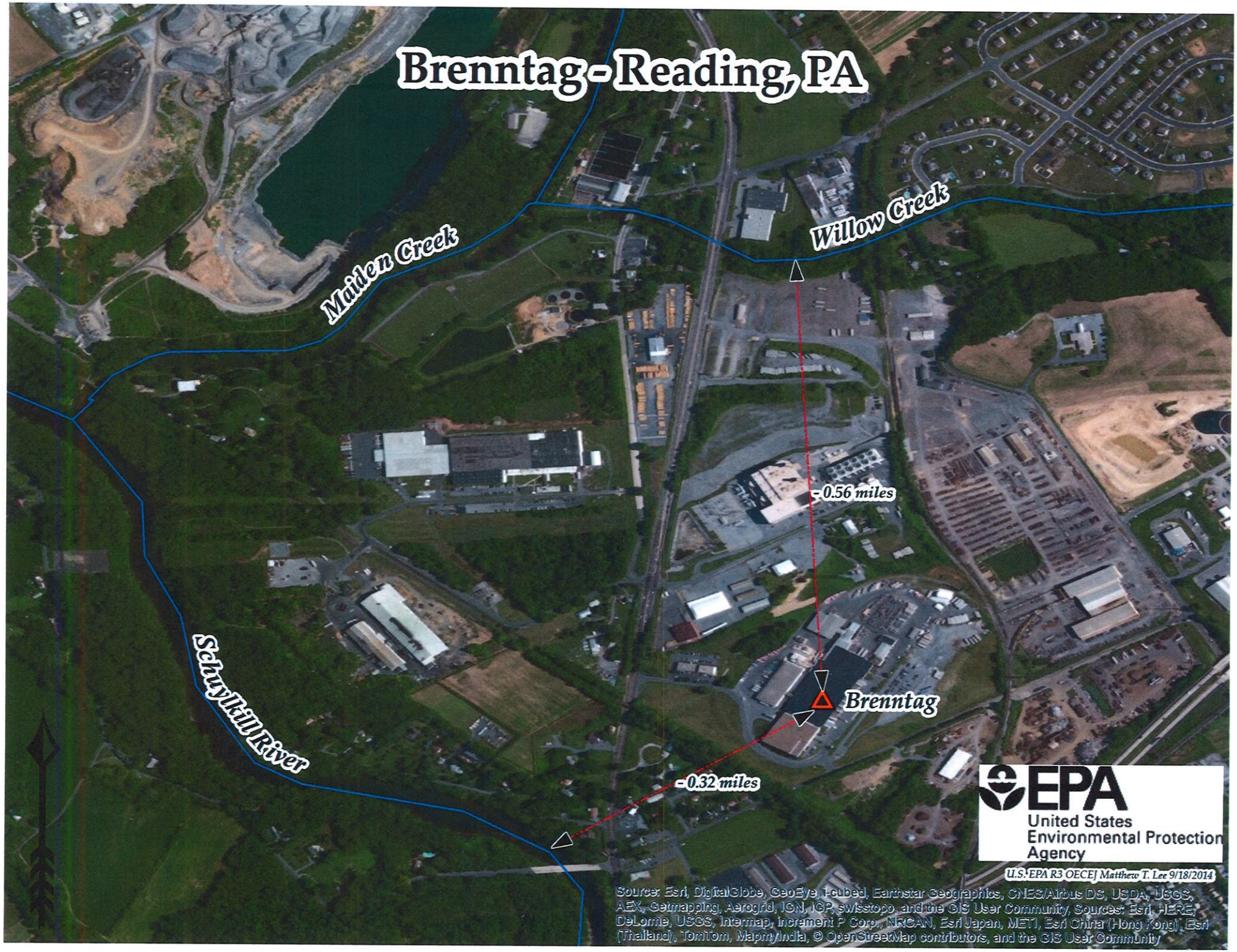
Photograph #27

The inside of the funnel when it's top is removed.

Photograph #26

This is the funnel used by facility staff when adding waste solvents to the tank.

Attachment #2 - Aerial Map of Brenntag


Brenntag - Reading, PA
Maiden Creek
Willow Creek
0.56 miles
Brenntag
Schuylkill River
0.32 miles
EPA
United States
Environmental Protection
Agency
U.S. EPA R3 OECEJ Matthew T. Lee 9/18/2014
Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community